IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF WISCONSIN

UNITED STATES OF AMERICA

v. Case No. 20 CR 048 WMC

GERARDO JUNIOR TORRES,

Defendant.

Defendant.

COUNT 1

On or about January 15, 2020, in the Western District of Wisconsin, the defendant,

GERARDO JUNIOR TORRES,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPhone 6 and a Seagate 1TB hard drive, to produce a visual depiction, a video with a file name that ends in 3-70, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

COUNT 2

On or about January 21, 2020, in the Western District of Wisconsin, the defendant,

GERARDO JUNIOR TORRES,

knowingly and intentionally used a minor, Minor A, to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, using materials that had previously been transported in interstate and foreign commerce, specifically, an Apple iPhone 6 and a Seagate 1TB hard drive, to produce a visual depiction, a video with a file name that

ends in 3-75, of Minor A engaged in sexually explicit conduct.

(In violation of Title 18, United States Code, Section 2251(a).)

FORFEITURE ALLEGATION

As a result of the offenses charged in Counts 1 and 2 of this indictment, and upon

conviction for violating Title 18, United States Code, Sections 2251(a), the defendant,

GERARDO JUNIOR TORRES,

shall forfeit to the United States pursuant to Title 18, United States Code, Section 2253, his

right, title, and interest in the following:

(1) Any and all visual depictions which contain images which are or appear to be

child pornography, together with the storage media in which they

are contained.

(2) Any and all property used or intended to be used to commit or to promote

the commission of the aforementioned offense, including an Apple iPhone 6 and a Seagate

1TB hard drive.

A TRUE BILL

PRESIDING JUROR

Indictment returned: 5/27/2020

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SCOTT C. BLADER

United States Attorney

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